

SHER TREMONTE LLP

November 28, 2023

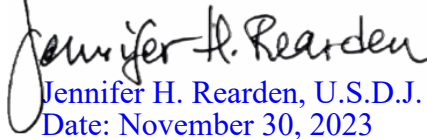
Application GRANTED. Defendant Isidore Handler's sentencing is adjourned to **February 28, 2024 at 11:00 am.**

VIA ECF

The Clerk of Court is directed to terminate ECF No. 174.

The Honorable Jennifer H. Rearden
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED.


Jennifer H. Rearden, U.S.D.J.
Date: November 30, 2023

Re: *United States v. Martin Handler, et al.*, No. 23-CR-004 (JHR)

Dear Judge Rearden:

We represent Isidore Handler. Mr. Handler is scheduled to be sentenced before Your Honor on January 4, 2024. Yesterday afternoon, the Probation Department filed its "Final Presentence Investigation Report" ("PSR") as to Mr. Handler. ECF No. 173. Unfortunately, for reasons not yet determined, we did not receive notification of the filing of the draft PSR, and, as a result, did not have the opportunity to review the draft version and file any objections before the final version was filed. (Indeed, even as of today, we cannot access the draft version.) We have reached out to the Probation Department to determine why we did not receive the draft version, but Officer Thomas has been out of the office.

In light of these circumstances, we respectfully request 14 days to review the PSR filed yesterday and to submit any possible objections. If necessary, we respectfully request that the Court direct the Probation Department to prepare a *revised* final version of the PSR. The government, which did receive the draft PSR on October 31, 2023, does not object to this request.

Given this delay, and because we need additional time to prepare our sentencing submission, we also respectfully request that the sentencing date be adjourned for approximately six to eight weeks. We have conferred with the government, and all counsel are available the week of February 26, 2024.

We appreciate the Court's consideration and apologize for any inconvenience.

Respectfully submitted,

/s/ _____

Justine A. Harris
Raphael A. Friedman
Attorneys for Isidore Handler